

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JAMES “JAMIE” MARSICANO

Plaintiff,

v.

SPECIAL AGENT RYAN LONG,  
individually; SPECIAL AGENT  
MICHAEL CARTER, individually;  
GAME WARDEN QUINTIN REED,  
individually; TROOPER CL. THOMAS,  
individually; DEPUTY CHIEF JESSICA  
BRUCE, individually; MAJOR JEFF  
CANTIN, individually; DEPUTY CHIEF  
GARY HARPER, individually; JOHN  
AND JANE DOE’S 1-100, employees,  
agents, and officers of several Georgia  
law enforcement agencies; and CITY OF  
ATLANTA, Georgia municipality,

Defendants.

) Civil Action No. 1:25-cv-00944-TRJ

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) Judge: Tiffany R. Johnson

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**JOINT MOTION FOR STAY OF  
PROCEEDINGS**

**COMES NOW**, the Plaintiff, James “Jamie” Marsicano, through undersigned Counsel, jointly with Defendants, before this Court, to file this JOINT MOTION FOR STAY OF PROCEEDINGS, requesting that this Court STAY all proceedings of this case until after such time as a final judgment has been issued in each of the following Georgia state cases, against the Plaintiff individually: 1) DeKalb County case D0293186, including any future case number associated with this arrest warrant number; and 2) Fulton County Superior Court case 23SC189192.

The parties agree that, at the conclusion of both criminal matters, notice is to be provided to this Court within 30 days of final judgment in both proceedings. The parties respectfully

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request that, after the disposition of both matters, and upon lift of the Stay, this Court GRANT 45 DAYS from the disposition of both proceedings for Defendants to serve their responsive pleadings.

In support of this Joint Motion, Plaintiff refers this Court to the contemporaneously filed MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S JOINT MOTION FOR STAY OF PROCEEDINGS.

DATED, this the 31st day of March, 2025.

/s/ Xavier Torres de Janon

Xavier T. de Janon

*Attorney for Plaintiff*

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/s/ Sandy Milord

Sandy Milord

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/s/ Paul Henefeld

Paul Henefeld

*Attorney for Defendants Ryan Long,*

*Michael Carter, Quintin Reed, and Cl.*

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**CERTIFICATE OF SERVICE**

I hereby certify that PLAINTIFF'S JOINT MOTION FOR STAY OF PROCEEDINGS,  
was filed and served on all the parties via the CM/ECF system and/or email to counsel of record  
as set out below:

**ATTORNEY FOR DEFENDANTS RYAN LONG, MICHAEL CARTER,  
QUINTIN REED, AND CL. THOMAS:**

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DATED, this the 31st day of March, 2025.

/s/ Xavier Torres de Janon  
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